

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NUMBER: 25-MJ-00037-SMM

FILED BY MB D.C.

Mar 25, 2025

ANGELA E. NOBLE
CLERK U.S. DIST. CT.
S. D. OF FLA. - FTP

UNITED STATES OF AMERICA,

v.

ENRIQUE CANTE-GOMEZ,

Defendant.

CRIMINAL COVER SHEET

1. Did this matter originate from a matter pending in the Northern Region of the United States Attorney's Office prior to August 8, 2014 (Mag. Judge Shaniek M. Maynard)? **No.**
2. Did this matter originate from a matter pending in the Central Region of the United States Attorney's Office prior to October 3, 2019 (Mag. Judge Jared M. Strauss)? **No.**
3. Did this matter involve the participation of or consultation with now Magistrate Judge Eduardo I. Sanchez during his tenure at the U.S. Attorney's Office, which concluded on January 22, 2023? **No.**
4. Did this matter involve the participation of or consultation now Magistrate Judge Marta Fulgueira Elfenbein during her tenure at the U.S. Attorney's Office, which concluded on March 5, 2024? **No.**

Respectfully submitted,

HAYDEN P. O'BYRNE
UNITED STATES ATTORNEY

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UNITED STATES DISTRICT COURT

for the

Southern District of Florida

FILED BY MB D.C.**Mar 25, 2025**ANGELA E. NOBLE
CLERK U.S. DIST. CT.
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United States of America

v.

ENRIQUE CANTE-GOMEZ,

Case No. 25-MJ-00037-SMM

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of March 20, 2025 in the county of Martin in the
Southern District of Florida, the defendant(s) violated:

Code Section

8 U.S.C. § 1326(a)

Offense Description

Previously Removed Alien Found in the United States.

This criminal complaint is based on these facts:

-SEE ATTACHED AFFIDAVIT-

☒ Continued on the attached sheet.*Complainant's signature*

Angelo Zaravelis, Deportation Officer, ICE/DHS

Printed name and title

Sworn to before me and signed in my presence.

Date: March 25, 2025*Judge's signature*City and state: Fort Pierce, Florida

Shaniek Mills Maynard, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Angelo Zaravelis, being duly sworn, depose and state as follows:

1. I am a Deportation Officer of the United States Department of Homeland Security, Immigration and Customs Enforcement ("ICE"), and have been employed in a similar capacity since 2007. I am currently assigned to Enforcement and Removal Operations, Criminal Alien Program, Stuart, Florida. As a Deportation Officer with ICE, my duties and responsibilities include enforcing criminal and administrative immigration laws of the United States. I have also conducted and participated in investigations of this nature.

2. This affidavit is based upon my own knowledge as well as information provided to me by other law enforcement officers. This affidavit does not set forth every fact known to me regarding the investigation but only those facts necessary to establish probable cause to believe that Enrique CANTE-GOMEZ ("CANTE-GOMEZ") committed the offense of being a previously removed alien found in the United States, in violation of Title 8, United States Code, Section 1326(a).

3. On March 19, 2025, CANTE-GOMEZ was arrested in Martin County, FL for the offenses of operate motor vehicle without valid license and leaving scene of crash involving damage to property. As part of the booking process, CANTE-GOMEZ was fingerprinted by the Martin County Jail booking officials. On March 20, 2025, the fingerprints recorded at the jail were matched in a federal database maintained by the Department of Homeland Security, alerting ICE officials to CANTE-GOMEZ's presence in the United States.

4. I reviewed documents from the immigration alien file belonging to CANTE-GOMEZ, AXXX XXX 569. A review of Department of Homeland Security electronic records and the immigration alien file assigned to CANTE-GOMEZ show that he is a native and citizen

of Guatemala. Records show that on or about July 10, 2011, CANTE-GOMEZ was ordered removed from the United States. Records in the alien file show that on or about July 28, 2011, CANTE-GOMEZ was removed from the United States to Guatemala.

5. On March 21, 2025, CANTE-GOMEZ made statements to your affiant. Post-Miranda, CANTE-GOMEZ stated that he is a citizen of Guatemala, that he was previously removed from the United States, that he reentered the United States without being inspected, and that he did not request permission to reenter the United States.

6. CANTE-GOMEZ's fingerprints recorded at the Martin County Jail on March 19, 2025 were scanned into the IDENT system, a biometric database maintained by the Department of Homeland Security. Results confirmed that the fingerprints belong to the individual who was previously removed from the United States, that is, Enrique CANTE-GOMEZ.

7. A record check was performed in the Computer Linked Application Informational Management System ("CLAIMS") to determine if CANTE-GOMEZ had filed an application for permission to reapply for admission into the United States after deportation or removal. After a search was performed in that database system, no record was found to exist indicating that CANTE-GOMEZ obtained consent from the Attorney General of the United States or from the Secretary of Homeland Security, for re-admission into the United States as required by law.

8. Based on the foregoing, your affiant avers that there exists probable cause to believe that, on or about March 20, 2025, Enrique CANTE-GOMEZ, an alien who has previously been deported and removed from the United States, was found in the United States without having received the express consent from the Attorney General or the Secretary of the Department of Homeland Security for re-admission into the United States, in violation of Title 8, United States Code, Section 1326(a).



Angelo Zaravelis
Deportation Officer
Immigration and Customs Enforcement

Subscribed and sworn to before me, by videoconference, in accordance with Rule 4.1 of the Federal Rules of Criminal Procedure, in Fort Pierce, Florida, this 25th day of March, 2025.



SHANIEK MILLS MAYNARD
UNITED STATES MAGISTRATE JUDGE